

EXHIBIT A

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MORRIS LAW GROUP

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January 18, 2013

Via Electronic and U.S. Mail

Jonathan Weed
Manager of ADR Services
American Arbitration Association
950 Warren Avenue
Providence, RI 02914-1414
E-mail: JonathanWeed@adr.org

Re: *Sussex et al. v. Turnberry/MGM Grand Towers, LLC, et al.*
AAA Case. No. 11 115 Y 264 12

Dear Mr. Weed:

This letter confirms our telephone conversation this afternoon and is respondents' formal Notice of Objection under AAA Commercial Rule 17 to the continued service of arbitrator Brendan Hare. We recently learned of material facts that speak directly and adversely to his status as a neutral arbitrator, and which, under AAA Rule 16, should have been disclosed by him at the outset of this arbitration and thereafter. Had these facts been disclosed to us (or, we believe, to the AAA), Mr. Hare would have been ineligible to serve as arbitrator under AAA Rule 17(a).

We ask the AAA to request Mr. Hare to cease all work in this arbitration until our objections are fully and finally resolved by the AAA and/or the court from which this arbitration is derived. In making this request, we also request that:

- (1) this notice, and its content, and information submitted hereafter addressing Mr. Hare's neutrality be kept strictly confidential;
- (2) that the arbitrator be informed only that "a party has objected to your continued service as arbitrator. You should cease all work as arbitrator until the objection is fully and finally resolved and you have resolution been advised of resolution by the AAA;" and

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(3) all parties be instructed that they should not communicate with the arbitrator in any manner until our objections have been finally determined.

We are compiling our objections to arbitrator Hare's continued service along with supporting information. We expect to file this material by Friday, January 25.

Very truly yours,



Steve Morris

SM:paf

Via electronic mail to:

Norman Blumenthal
Robert B. Gerard
Kevin Hernandez
Ricardo R. Ehmann
Burton Wiand